City of Seattle

Gregory J. Nickels, Mayor
**Department of Planning and Development**
D. M. Sugimura, Director

**CITY OF SEATTLE**
**ANALYSIS AND DECISION OF THE DIRECTOR OF**
**THE DEPARTMENT OF PLANNING AND DEVELOPMENT**

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| **Application Number:** | 2302041 |
| **Applicant Name:** | Bill Auld of NBBJ for Virginia Mason Medical Center |
| **Address of Proposal:** | 1100 9th Avenue |

## SUMMARY OF PROPOSED ACTION

Master Use Permit for future construction of a 7-story, 145-foot high addition to an existing hospital (Virginia Mason Medical Center).[1] Emergency room drop-off parking for six vehicles at grade. Ambulance access to be relocated to enter on Spring Street and exit on Boren Street. The existing structure (the Northcliffe Apartments) is to be demolished under separate permit.

The following approval is required:

**SEPA – For Conditioning Only – Seattle Municipal Code Chapter 25.05**

**SEPA DETERMINATION:** [ ] Exempt [ ] DNS [ ] MDNS [ X ] EIS[2]

[ ] DNS with conditions

[ ] DNS involving non-exempt grading, or demolition, or involving another agency with jurisdiction

## BACKGROUND

Site and Vicinity

The project site is located along Boren Avenue between Seneca Street and Spring Street within Virginia Mason Medical Center's Major Institution Overlay (MIO) District in Seattle's First Hill neighborhood. The approximately 32,640-square foot (0.75-acre) project site is bounded by Seneca Street to the north, Boren Avenue to the east, Spring Street to the south, and a vacated alley to the west. Virginia Mason Medical Center's MIO covers approximately seven square blocks within a varying boundary

[1] The project was originally noticed on December 18, 2003, as a proposed 11-story, 240-foot high structure. A revised notice of application was published on April 15, 2004, to provide public notice of the height reduction to 145 feet.

[2] A Final Environmental Impact Statement (FEIS) for the Virginia Mason Medical Center Major Institution Master Plan was published in November 1992. An Addendum to the FEIS has been prepared for the current proposal. The Department has determined that the proposal would not result in additional significant adverse impacts beyond those addressed in the FEIS. SEPA review for the current proposal is limited to review for conditioning purposes only.

generally established by University Street, Boren Avenue, Spring Street, and an alley between 8th and 9th Avenues.

The site is currently developed with the Northcliffe Apartments building which is located at the north end of the site along Boren Avenue and Seneca Street; this structure is proposed to be demolished. The south end of the site had been developed with the Hudson Arms Apartments, but this structure was destroyed by fire. A temporary parking area has been used in the former location of the Hudson Arms. This temporary parking area would be eliminated.

The development site is zoned Major Institution Overlay with a base height of 240 feet and an underlying zoning designation of Highrise ("MIO-240-HR"). The site slopes gradually down from the Boren Avenue property line toward the west; however, the site is relatively flat due to grading done for previous development. The site is not located in any mapped or otherwise observed Environmentally Critical Areas.

The surrounding properties contain a mix of institutional and residential uses. The MIO stretches to the west and northwest of the subject site; properties within the MIO are developed with institutional (hospital) uses. To the north, south, and east, surrounding properties largely consist of multi-family residential uses including high-rise structures. Madison Street, located one block south of the subject site, is primarily developed with commercial uses.

Proposal

The proposed development consists of a 7-story, 145-foot high addition to the existing hospital development. This proposal was referred to as the "East Campus Addition" in the adopted Virginia Mason Medical Center (VMMC) Major Institution Master Plan (MIMP), and that term will be used throughout this analysis and decision.

The site of the East Campus Addition is currently occupied by the Northcliffe Apartments building which is located at the corner of Seneca Street and Boren Avenue. In addition, a temporary parking area providing 20 parking spaces is located south of the Northcliffe Apartments at the former site of the Hudson Arms apartments. Both the Northcliffe Apartments and the temporary parking area would be demolished for the construction of the East Campus Addition.

The East Campus Addition would allow VMMC to upgrade its patient care facilities by replacing obsolete hospital spaces; providing new operating rooms, an Intensive Care Unit, and a Critical Care Unit; and relocating its emergency department. No new patient beds would be added to the hospital facility. The 145-foot high, 7-story building also includes a rooftop mechanical penthouse, one level of below-grade hospital program area, and three levels of below-grade electrical and mechanical support systems. Six parking spaces for patient drop-off would be provided on Level 2 with access from a new curbcut on Spring Street. Because the hospital's emergency department would be relocated to the East Campus Addition, access for emergency vehicles is also proposed within the new structure with an entrance on Spring Street and a right-turn-only southbound exit onto Boren Avenue.

The design of the building includes floor-to-floor heights of approximately 21 feet. This increased floor-to-floor height would accommodate mechanical interstitial space between each floor and allow future

alignment of the East Campus Addition floors with the existing hospital building. In addition, the mechanical equipment serving individual floors would enable floors to be isolated for infectious disease control purposes.

The exterior of the structure would be integrated with the existing campus materials and color palette. Along Seneca Street and Boren Avenue, pedestrian-level amenities would include street trees, planting strips, decorative pavers, canopies, and art glass walls.

The project also includes right-of-way dedication and street improvements. Along the site frontage, the existing Boren Avenue right-of-way width is 66 feet but has a required right-of-way width of 76 feet. Therefore, a right-of-way dedication equal to half of the deficit (five feet) is shown along the site frontage and would be required prior to completion of construction. Furthermore, the existing Boren Avenue roadway width is 46 feet but has a required roadway width of 55 feet. The roadway width would be increased during the construction phase of the project. Finally, the project would also utilize below-grade portions of the Boren Avenue right-of-way for an areaway designed to provide venting and utilities; final design of the areaway improvements would be subject to review and approval by the Seattle Department of Transportation.

Public Notice and Comment

A Notice of Application was provided on December 18, 2003, for an 11-story, 240-foot high structure. The project notice included a request for a Director's interpretation (for a minor or major amendment to the MIMP). The standard 14-day public comment period was extended an additional 14 days and ended on January 14, 2004. Substantive comments that were received included concerns about the height of the proposed addition, traffic impacts, demand for parking, relocation of the emergency vehicle access, noise, and disturbance of views.

In March 2004, revised plans were submitted showing that the proposed addition had been reduced from 240 feet to 145 feet in height. Therefore, a Revised Notice of Application was provided on April 15, 2004. The revised notice removed the request for a Director's interpretation because the project no longer constituted an amendment to the MIMP. The 14-day public comment period was again extended an additional 14 days and ended on May 13, 2004. Substantive comments primarily related to traffic impacts, relocation of the emergency vehicle access, noise, proximity to hospital use, and disturbance of views.

On May 3, 2004, the Department provided a Notice of EIS Addendum Availability. The 15-day comment period for this notice ended on May 17, 2004. Substantive comments that were received primarily raised concerns about the consistency of the proposal with the adopted MIMP.

## ANALYSIS - MASTER PLAN

A Major Institution Master Plan (MIMP) for VMMC was adopted in May 1994. The MIMP expires on May 24, 2004. When the East Campus Addition application was first submitted in November 2003, it was proposed to be an 11-story, 240-foot high structure. This was considered to be a "change" from

the 1994 MIMP. Therefore, per SMC 23.69.035, the project required a determination of whether the change constituted an exempt change or a minor or major amendment to the MIMP.

However, the proposal was revised in March 2004 to reduce the structure from 240 feet high with eleven stories to 145 feet high with seven stories. The 145-foot structure height is consistent with the East Campus Addition development contemplated by the adopted MIMP. Furthermore, the design of the East Campus Addition, including relocated emergency vehicle access and drop-off patient parking, is not inconsistent with the adopted MIMP's anticipated uses for the East Campus Addition.

The proposal includes one change from the adopted MIMP: the East Campus Addition was originally proposed to be constructed in two phases; the subject proposal would allow construction of the addition in a single phase. The adopted MIMP contains no conditions requiring the phasing of the East Campus Addition. Therefore, this change is an "exempt change" under SMC 23.69.035(B)(4) which states that: "Exempt changes shall be . . . [a]ny change in the phasing of construction, if not tied to a master plan condition imposed under approval by the Council."

Therefore, no amendment (either minor or major) to the MIMP is proposed, and no further analysis under SMC 23.69.035 is appropriate.

## ANALYSIS – STATE ENVIRONMENTAL POLICY ACT (SEPA)

SEPA analysis relies on the Final Environmental Impact Statement for the Virginia Mason Medical Center Major Institution Master Plan (published in November 1992) and the Addendum to the EIS that was prepared for the subject proposal. The analysis also relies on other technical environmental reports. The decision makes reference to and incorporates the project plans submitted with the project application on November 19, 2003, as subsequently revised.

The Seattle SEPA Ordinance provides authority to require mitigation of adverse impacts resulting from a proposed project (SMC 25.05.655 and 25.06.660). Mitigation, when required, must be related to specific environmental impacts identified in an environmental document and may be imposed to the extent that (1) a given impact is attributable to the proposal and (2) the mitigation is reasonable and capable of being accomplished. Additionally, mitigation can be required only when based on policies, plans, and regulations as enunciated in SMC 25.05.665 through SMC 25.05.675, inclusive (SEPA Overview Policy, SEPA Cumulative Impacts Policy, SEPA Specific Environmental Policies). In some instances, local, state, or federal regulatory requirements would provide sufficient mitigation of an impact, and additional mitigation imposed through SEPA would not be necessary.

The SEPA Overview Policy (SMC 25.05.665) clarifies the relationship between codes, policies, and environmental review. Specific policies for each element of the environment, certain neighborhood plans, and other policies explicitly referenced may serve as the basis for exercising substantive SEPA authority. The Overview Policy states in pertinent part that "Where City regulations have been adopted to address an environmental impact, it shall be presumed that such regulations are adequate to achieve sufficient mitigation." Under specific circumstances, mitigation may be required even when the Overview Policy is applicable (See SMC 25.05.665(D)).

## ENVIRONMENTAL IMPACTS

The original MIMP required the development of an EIS to evaluate the impacts of that Plan. The FEIS considered the following environmental impacts: Air; Energy; Environmental Health; Land Use; Housing; Light and Glare; Height, Bulk and Scale; Shadows; Parking; and Transportation. Furthermore, the Addendum prepared for the East Campus Addition provided additional information on Height, Bulk, and Scale; Historic Preservation; Light and Glare; Parking, Shadows, and Transportation. Supporting documentation includes a geotechnical report dated October 28, 2003, and prepared by GeoEngineers.

The information provided by the applicant and its consultants, the public comments received, and the experience of the lead agency with the review of similar proposals form the basis for review and conditioning of the proposal. The potential environmental impacts disclosed by the Draft EIS, the Final EIS, and the Addendum are discussed below. Where appropriate, mitigation may be required pursuant to Seattle's SEPA Ordinance (SMC 25.05).

Short-Term Impacts

Demolition and construction activities could result in the following temporary or construction-related adverse impacts:

- Construction dust and storm water runoff;
- Increased traffic and demand for parking from construction equipment and personnel;
- Occasional disruption of vehicular and pedestrian traffic;
- Decreased air quality due to suspended particulates from building activities and hydrocarbon emissions from construction vehicles and equipment;
- Increased noise; and
- Consumption of renewable and non-renewable resources.

Several adopted codes and/or ordinances provide mitigation for some of the identified impacts: The Noise Ordinance, the Stormwater Grading and Drainage Control Code, the Street Use Ordinance, and the Building Code. The Stormwater, Grading and Drainage Control Code regulates site excavation for foundation purposes and requires that soil erosion control techniques be initiated for the duration of construction. The Street Use Ordinance requires debris to be removed from the street right-of-way, and regulates obstruction of the pedestrian right-of-way. Puget Sound Clean Air Agency regulations require control of fugitive dust to protect air quality. The Building Code provides for construction measures in general. Finally, the Noise Ordinance regulates the hours and amount of construction noise that are permitted in the City. Compliance with these applicable codes and ordinances would reduce or eliminate most short-term impacts to the environment.

Any conditions to be enforced during construction should be posted at each street abutting the site in a location on the property line that is visible and accessible to the public and to construction personnel from the street right-of-way. The conditions should be affixed to placards prepared by DPD. The placards will be issued along with the building permit set of plans. The placards should be laminated

with clear plastic or other waterproofing material and should remain posted on-site for the duration of construction.

*Air Quality*

The Puget Sound Clean Air Agency (PSCAA) regulations require control of fugitive dust to protect air quality, and the agency requires permits for removal of asbestos (if any) during demolition. However, there is no permit process to ensure that PSCAA would be notified of the proposed demolition. A condition should be included pursuant to SEPA authority under SMC 25.05.675(A), requiring that a copy of the PSCAA permit be submitted to DPD before issuance of the demolition permit. Furthermore, the adopted MIMP includes a condition relating to air quality (Part IV.J, Condition 12) which applies to the East Campus Addition and is non-appealable. The condition requires that construction equipment be maintained in good working condition and that demolition materials be used whenever possible. Together, these conditions would mitigate adverse impacts to air quality and ensure proper handling and disposal of asbestos, if it is encountered on the proposal site.

*Noise*

The adopted MIMP requires that construction hours (to include both demolition and construction activities) be limited to non-holiday weekdays between the hours of 7:30 a.m. and 6:00 p.m. (MIMP Part IV.J, Condition 10). This condition applies to the East Campus Addition and is non-appealable.

The adopted MIMP also requires that building contractors provide a noise consultant to measure construction and mechanical system noises generated by each project (MIMP Part IV.J, Condition 11). Measurements are to be taken from receiving properties. If applicable noise levels are exceeded, a noise variance should be obtained or noise reduction methods should be promptly applied to bring noise levels within code limits. This condition also applies to the East Campus Addition and is non-appealable. As conditioned, noise impacts are considered adequately mitigated.

*Construction Parking*

The adopted MIMP requires construction personnel to park at an off-site location and be shuttled to and from the site (MIMP Part IV.J, Condition 9). This condition applies to the proposed East Campus Addition development and is non-appealable. As conditioned, short-term parking impacts are considered adequately mitigated.

*Construction Traffic*

Due to the scope of the proposed structure, it is anticipated that there would be construction traffic-related impacts within the immediate vicinity of the project. Therefore, a Construction Phase Transportation Plan should be prepared and submitted to DPD to address issues such as ingress and egress of construction equipment and vehicles, limitation of trips by earth-moving vehicles, truck access routes, and street and sidewalk closures.

Long-Term Impacts

Anticipated long-term impacts are typical of a structure developed for hospital use and would in part be mitigated by the City's adopted codes and/or ordinances. Specifically these include: Stormwater, Grading and Drainage Control Code (stormwater runoff from additional site coverage by impervious surface); Land Use Code; and the Seattle Energy Code (long-term energy consumption). Only those

environmental impacts that may result in long-term impacts and may require mitigation measures beyond those provided in existing laws and regulations are discussed below.

*Environmental Health*

Public comments raised concerns that the East Campus Addition's treatment of patients with infectious diseases would create impacts on the nearby residential uses that are located east of the site. State regulations impose specific requirements on the venting of air from hospitals including filtration requirements for air that has been exposed to infectious substances (WAC 246-320-525). Therefore, compliance with State law would adequately mitigate environmental health impacts.

*Height, Bulk and Scale*

It is the City's policy that the height, bulk, and scale of development should be reasonably compatible with the general character of development anticipated by adopted land use regulations and should provide a reasonable transition between areas of less intensive and more intensive zoning (See SMC 25.05.674(G)(2)). These issues were analyzed under the heading of "Aesthetics" in the Final EIS. The FEIS concluded that the proposed East Campus Addition would cause the additional impairment of some private views and that this was a significant impact that could not be mitigated.

The adopted MIMP contains a condition addressing height, bulk, and scale which requires that the standing committee provide comment on each proposed building within the MIO (MIMP Part IV.I, Condition 8). The Standing Citizens Advisory Committee (SCAC) met on November 4, 2003, to consider the proposed East Campus Addition (then proposed at a height of 240 feet). The SCAC commented that the proposed structure should utilize some of the building materials (such as light brick) that are present in existing buildings within the MIO. This comment should be incorporated into the final design of the building prior to issuance of any construction permit. As conditioned, height, bulk, and scale impacts are considered adequately mitigated.

*Historic Preservation*

Although the adopted MIMP anticipated that the existing Northcliffe Apartments structure would be demolished for the East Campus Addition construction, no historic review of the structure was incorporated into the Final EIS or the MIMP. Because the structure is over 50 years old and because multiple public comments suggested that the structure could be historic, DPD referred the structure to the Landmarks Preservation Board ("Board") for consideration (SMC 25.05.675H)). The Board responded that additional information was needed and requested that the applicant prepare and submit a landmark nomination.

In response, VMMC prepared a nomination that was submitted to the Board for review and consideration. On April 7, 2004, the Board concluded that the Northcliffe Apartments does not meet the criteria for designation as an historic landmark. Therefore, demolition of the structure would not result in a significant adverse impact to historic landmark resources, and no further conditioning is warranted.

*Light and Glare*

The Final EIS prepared for the 1994 MIMP analyzed potential light and glare impacts resulting from the proposed East Campus Addition. However, the FEIS contained conflicting references to the height of the East Campus Addition, so the EIS Addendum provided additional information about the potential light and glare impacts from the 145-foot high structure. The Addendum found that the anticipated light and glare impacts are consistent with those anticipated in the Final EIS. Conditions were placed on the MIMP to ensure that light and glare impacts would be minimized (MIMP, Part IV.I, Conditions 3 and 4). These conditions apply to the East Campus Addition and are non-appealable. As conditioned, light and glare impacts are considered adequately mitigated.

*Parking*

With the development of the East Campus Addition, a total of 1,201 off-street parking spaces would be required within the hospital's Major Institution Overlay District boundaries. However, the East Campus Addition itself is not expected to result in increased parking demand because the project would not increase the number of VMMC patients or employees.

Currently, there are 1,127 off-street parking spaces provided within the MIO. This means that there is an existing parking deficit of 74 parking spaces (1,201 required – 1,127 provided). The East Campus Addition would remove 20 existing parking spaces (by demolishing the temporary parking lot located at Boren Avenue and Spring Street) and add six (6) parking spaces (for patient drop-off within the proposed structure). Therefore, a total of 1,113 off-street parking spaces would be provided within the MIO, resulting in a deficit of 88 parking spaces (1,201 required – 1,113 provided).

According to the Land Use Code, a major institution with a deficit of required off-street parking spaces must supply five percent (5%) of the existing parking deficit with each new development (SMC 23.54.016(B)(5)). Therefore, the East Campus Addition must supply an additional 18 parking spaces (14 spaces to make up the difference between the 1,127 pre-development spaces and the 1,113 post-development spaces + 4 spaces to account for 5% of the existing 74-space deficit). VMMC has stated that these 18 off-street parking spaces would be provided within the MIO. Prior to issuance of any construction permits, the location of these spaces should be specified.

*Shadows on Open Spaces*

The Final EIS also analyzed potential shadow impacts to Freeway Park and the connecting Pigott Corridor. The Addendum's shadow analysis reviewed potential impacts of a 145-foot high structure during the late morning/early afternoon times during spring, fall, and summer and found that the proposed East Campus Addition would have no shadow impact on Freeway Park. Therefore, no further conditioning is warranted.

*Traffic and Transportation*

The FEIS for the MIMP provided an analysis of transportation and traffic related impacts associated with the development of the Major Institution Master Plan. The transportation and traffic analyses in the

FEIS evaluated both existing conditions at the time of the report as well as future conditions with the development of all proposed buildings identified in the MIMP. However, due to the nature of traffic and transportation issues associated with the proposed East Campus Addition additional discussion is warranted.

The East Campus Addition would replace existing obsolete hospital facilities and would, therefore, result in no new employees or patients. Therefore, the structure would not increase VMMC trip generation. Furthermore, because the new structure would not displace nor provide a significant number of parking spaces, the project would have a negligible impact on traffic volumes, traffic circulation patterns, and traffic operations within the VMMC campus and vicinity.

However, the project would involve the relocation of VMMC's emergency vehicle access. Therefore, a discussion of associated impacts is appropriate. The current location for emergency vehicle access is a single entrance/exit driveway on Spring Street at its intersection with Terry Avenue. The East Campus Addition would relocate the emergency vehicle entrance to an entrance-only driveway on Spring Street one-half block north of the existing access. Emergency vehicles would exit southbound onto Boren Avenue from a right-turn-only driveway.

Currently, there are between approximately one and three ambulances arriving to and departing from VMMC's emergency department per hour. Because the relocation of the emergency vehicle access is not proposed to be accompanied with an upgrade in trauma care facilities, the average number of ambulance trips per hour would not increase. Furthermore, separate driveways are proposed for the emergency vehicle entrance and the patient drop-off entrance. This would reduce potential vehicular conflicts. Therefore, the relocation of the emergency vehicle access would not result in significant adverse impacts.

There is also a significant amount of pedestrian activity along the streets bordering the proposed East Campus Addition. Pedestrian crossings at the Boren Avenue/Seneca Street intersection are protected by a full traffic signal and marked crossings. However, traffic is unrestricted along Boren Avenue at the Spring Street intersection. The East Campus Addition would not increase pedestrian levels on Seneca Street, Spring Street, or Boren Avenue nor would the development exacerbate existing pedestrian/vehicular conflicts. Therefore, no conditioning is warranted to mitigate existing conditions. Nevertheless, the VMMC has considered possible ameliorative improvements that may be incorporated into the East Campus Addition's construction permit review. These possible future improvements include crosswalk markings and accessible ramps.

In conclusion, the proposed East Campus Addition would not have any significant adverse impacts on traffic and transportation. Therefore, no conditioning is warranted.

## DECISION – SEPA

The application is **CONDITIONALLY APPROVED** as referenced below.

## SEPA - CONDITIONS

The owner(s) and/or responsible party(s) shall:

*Prior to issuance of any Construction or Grading Permits:*

1. Prepare and submit a Construction Phase Transportation Plan to be reviewed by the Land Use Planner with input from the Seattle Department of Transportation. Plans shall document the following elements:

    - Location of ingress/egress for construction equipment and trucks;
    - Limitation of trips by earth-moving vehicles to hours prior to 3:00 p.m.;
    - Truck access routes, to and from the site, for the excavation and construction phases; and,
    - Any street and sidewalk closures.

2. Submit an off-site parking and shuttle plan for construction personnel.

3. Submit a copy of the PSCAA demolition permit.

4. Utilize some of the building materials (such as light brick) that are present in existing structures within the MIO to visually incorporate the new structure into the Virginia Mason Medical Center campus.

*During Construction:*

5. Implement the measures in Construction Phase Transportation Plan approved by DPD and Seattle Department of Transportation (SDOT).

**Major Institution Master Plan – CONDITIONS**

The following are conditions of the 1994 Virginia Mason Medical Center Major Institution Master Plan and are NON-APPEALABLE.

*Prior to issuance of any Construction Permits:*

I.2. "Recycling areas for bottles, cans, paper, and plastic shall be indicated on plans for [the building]. . . . Recycling areas shall be located to minimize adverse visual impact, noise, and odors. Location of each recycling area and sign wording and location shall be subject to review by [DPD]."

I.3. "Plans shall indicate the location, direction, and intensity of proposed exterior lighting. [The building] shall be designed to shield or direct exterior lights away from light-sensitive structures, including nearby residences."

I.4. "VMMC shall provide evidence to [DPD] that buildings will not cause adverse glare impacts. Finishes and windows on [the building] shall be of a low-reflectivity or non-reflective color or tint."

*During Construction:*

J.9. "In order to minimize construction parking impacts . . ., construction personnel shall be required to park at an off-site location and be shuttled to and from the site. VMMC shall ensure that

construction workers do not park on the streets or in private lots in the VMMC campus vicinity. A clause stating this requirement shall be included in all construction contracts."

J.10. "Construction hours (to include both demolition and construction activities) shall be limited to non-holiday weekdays between the hours of 7:30a.m. and 6:00p.m. This limitation is subject to minor revisions at the discretion of [DPD] to allow work of an emergency nature, work requiring obstruction of street rights-of-way, and minor, usually interior work of low noise impact."

J.11. "Building contractors shall be required to provide a noise consultant to measure construction and mechanical system noises generated by each project. Measurements shall be taken from receiving properties. If applicable noise levels are exceeded, a variance shall be obtained from the applicable authority or noise reduction methods shall be promptly applied to bring noise levels within Code limits.

"Whenever possible, special measures for noise control of unusually loud equipment or activities shall be used during construction. This equipment could include special mufflers for machine engine exhausts or air powered equipment and acoustical screens or enclosures to be used as needed."

J.12. "VMMC shall use the latest equipment available and keep construction equipment in good working condition. In addition, VMMC shall reuse demolition materials to the greatest extent possible on-site and ensure that long periods of construction equipment idling are avoided."

**Land Use Code Compliance – CONDITION**

The following condition is based on Land Use Code authority and is NON-APPEALABLE.

The owner(s) and/or responsible party(s) shall:

*Prior to issuance of any Construction Permits:*

1. Identify the location of the eighteen (18) off-street parking spaces required by SMC 23.54.016(B)(5) to reduce the hospital's existing off-street parking deficit.

Signature: (signature on file) Date: May 24, 2004
Leslie C. Clark, AICP
Land Use Planner

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